

objection to the specification under 25 USC §132 is believed moot. Reconsideration is therefore requested.

OBJECTION TO THE DRAWINGS UNDER 37 CFR §1.83(a) AND OBJECTION TO THE SPECIFICATION UNDER 35 USC §112, 1ST PARAGRAPH AND REJECTION OF CLAIMS 1-4, 6-11 AND 13

In response to the objection of the drawings, specification and claims as noted above, applicant has submitted the Declaration of Michael T. MacKay under 37 CFR §1.132 which should clearly demonstrate that a person of ordinary skill in the art would recognize each of the claimed elements in the drawings, and that the specification describes and enables each of the elements recited in the claims. The Declaration addresses each of the Examiner's comments and is not repeated here.

Accordingly, reconsideration of the objection to the drawings, objection to the specification and rejection of claims 1-4, 6-11 and 13 under 35 USC §112, 1st paragraph is respectfully requested.

REJECTION OF CLAIMS 1, 2, 7, 8 AND 9 UNDER 35 USC §102(b)

The Examiner rejected claims 1, 2, 7, 8 and 9 under 35 USC §102(b) as anticipated by Naimark, et al. Applicant respectfully traverses the rejection and reconsideration is requested. As pointed out in prior papers, the Naimark system was a manually compiled video system. The present application differs in that it includes "processing means" for assembling a data base for the content image. No such processing means is found in Naimark, et al.

In the Official Action, the Examiner stated that claims are not limited to a system for "automatically" assembling the data base. However, the claims are clearly limited to a processing means for accomplishing that function. There is no corresponding processing means in Naimark, et al.

Accordingly, reconsideration of the rejection of claims 1, 2, 7, 8 and 9 under 35 USC §102(b) is respectfully requested.

REJECTION OF CLAIMS 3, 6, 10 AND 13 UNDER 35 USC §102(e)

The Examiner rejected claims 3, 6, 10 and 13 under 35 USC §102(e) as anticipated by Morgan. The Examiner stated position in response to Applicant's earlier remarks is that "the Morgans controlling surveillance cameras may work differently to the applicant's device, but is broadly reads on the claims." (sic) This comment by the Examiner is incomprehensible. Applicant points out that there is no structure in Morgan corresponding to the controllable means generating frames of video data having a content indicated by control signals which are

in turn generated in response to a content video image. Examiner is asked to explicitly point out the structure of Morgan which performs such functions in any further rejection of the claim based on this reference.

Accordingly, reconsideration of the rejection of claims 3, 6, 10 and 13 under 35 USC §102(e) is respectfully requested.

REJECTION OF CLAIMS 4 AND 11 UNDER 35 USC §103

The Examiner rejected claims under 4 and 11 under 35 USC §103 as unpatentable over Morgan, in view of International Conference on Advance Robotics.

Applicant points out that claims 4 and 11 depend from claims 3 and 10 respectively, and are believed allowable for at least the same reasons as their parent claims. Furthermore, there is no teaching in the combination of references cited by the Examiner of the structure recited in the parent claims, that a robotics structure should be coupled with a content video image driven controller as recited in the present application.

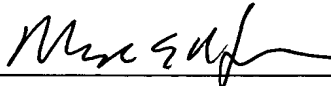
Accordingly, reconsideration of the rejection of claims 4 and 11 under 35 USC §103 is respectfully requested.

CONCLUSION

It is submitted that the present application is now in form for allowance, and such action is respectfully requested.

Respectfully submitted,

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